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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DAMIAN HAMILTON

Plaintiff,

vs.

KEOLIS TRANSIT SERVICES, LLC dba KEOLIS
TRANSIT AMERICA dba KEOLIS
TRANSPORTATION dba REGIONAL
TRANSPORTATION COMMISSION OF
SOUTHERN NEVADA dba RTC; DOE BUS
DRIVER I-V; DOE DOG OWNER I-V; ROE BUS
COMPANY I-V; ROE EMPLOYER I-V; ROE
COMPANY I-V

Defendant.

Case No.: 2:20-cv-101

**Keolis Transit Services, LLC's Petition
for Removal**

Keolis Transit Services, LLC petitions to remove this case to the United States District Court for the District of Nevada from the Eighth Judicial District Court for the State of Nevada. This petition for removal is signed per Rule 11.

Removal is appropriate per 28 U.S.C. § 1441 because diversity jurisdiction is present per 28 U.S.C. 1332. Plaintiff alleges he is Nevadan.¹ Keolis Transit Services, LLC is a wholly owned subsidiary of Keolis Transit America, Inc., a Delaware corporation with its principal place of business in California. Plaintiff alleges injury from a motor vehicle collision that occurred on

¹ ECF No. 1-2 at ¶ 1.

1 January 20, 2018.² Plaintiff's Complaint alleges he sustained injuries and damages in a sum in
2 excess of \$75,000.00 for special and general damages.³ The complaint is thus removable on its
3 face.

4 DATED this 15th day of January, 2020.



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8 BY: /s/ Michael P. Lowry

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28 ² *Id.* at ¶ 15-17.

³ *Id.* at ¶ 22, 29.

Certificate of Service

Pursuant to FRCP 5, I certify that I am an employee of Wilson Elser Moskowitz Edelman & Dicker LLP, and that on January 15, 2020, I served **Keolis Transit Services, LLC's Petition for Removal** as follows:

- ☒ by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;
- ☐ via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk;

Price Beckstrom PLLC 7312 W. Cheyenne Ave., Suite 5 Las Vegas, NV 89129 P: 702-941-0503 F: 702-507-2335	
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BY: /s/ Michael Lowry
 An Employee of

